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MAY 28 2021

CLERK, U.S. DISTRICT COURT
ST. PAUL, MN

UNITED STATES DISTRICT COURT
DISTRICT OF MINNESOTA

Fnu Brunhilda

Plaintiff(s),

vs.

Case No. 21cv1299 PJS/DTS
(To be assigned by Clerk of District Court)

- Purdue University Global
- Indiana Commission of Higher
Education

DEMAND FOR JURY TRIAL

YES ☒ NO ☐

Defendant(s).

(Enter the full name(s) of ALL defendants in
this lawsuit. Please attach additional sheets
if necessary).

COMPLAINT

PARTIES

1. List your name, address and telephone number. Do the same for any additional plaintiffs.

a. Plaintiff

Name	Fnu Brunhilda
Street Address	7357 Jensen Ave S
County, City	Washington county, Cottage Grove
State & Zip Code	MN, 55016
Telephone Number	(651) 500-6507

SCANNED

MAY 28 2021

U.S. DISTRICT COURT ST. PAUL

2. List all defendants. You should state the full name of the defendant, even if that defendant is a government agency, an organization, a corporation, or an individual. Include the address where each defendant may be served. Make sure that the defendant(s) listed below are identical to those contained in the above caption.

a. Defendant No. 1

Name **Purdue University Global**
Street Address **610 Purdue Mall Rm 240**
County, City **Tippecanoe, West Lafayette**
State & Zip Code **Indiana, 47907**

b. Defendant No. 2

Name **Indiana Commission for Higher Education**
Street Address **101 W Ohio Street suite 300**
County, City **Marion County, Indianapolis**
State & Zip Code **Indiana, 46204**

c. Defendant No. 3

Name
Street Address
County, City
State & Zip Code

NOTE: IF THERE ARE ADDITIONAL PLAINTIFFS OR DEFENDANTS, PLEASE PROVIDE THEIR NAMES AND ADDRESSES ON A SEPARATE SHEET OF PAPER.

Check here if additional sheets of paper are attached: ☐

Please label the attached sheets of paper to correspond to the appropriate numbered paragraph above (e.g. Additional Defendants 2.d., 2.e., etc.)

JURISDICTION

Federal courts are courts of limited jurisdiction. Generally, two types of cases can be heard in federal court: cases involving a federal question and cases involving diversity of citizenship of the parties. Under 28 U.S.C. § 1331, a case involving the United States Constitution or federal laws or treaties is a federal question case. Under 28 U.S.C. § 1332, a case in which a citizen of one state sues a citizen of another state and the amount of damages is more than \$75,000 is a diversity of citizenship case.

3. What is the basis for federal court jurisdiction? (*check all that apply*)

☐ Federal Question

☒ Diversity of Citizenship

4. If the basis for jurisdiction is Federal Question, which Federal Constitutional, statutory or treaty right is at issue? List all that apply.

5. If the basis for jurisdiction is Diversity of Citizenship, what is the state of citizenship of each party? Each Plaintiff must be diverse from each Defendant for diversity jurisdiction.

Plaintiff Name: **Fnu Brunhilda**

State of Citizenship: **Minnesota**

Defendant No. 1: **Purdue University Global**

State of Citizenship: **Indiana**

Defendant No. 2: **Indiana C.H.E**

State of Citizenship: **Indiana**

Attach additional sheets of paper as necessary and label this information as paragraph 5.

Check here if additional sheets of paper are attached. ☐

6. What is the basis for venue in the District of Minnesota? (*check all that apply*)

☐ Defendant(s) reside in Minnesota

☒ Facts alleged below primarily occurred in Minnesota

☐ Other: explain

STATEMENT OF THE CLAIM

Describe in the space provided below the basic facts of your claim. The description of facts should include a specific explanation of how, where, and when each of the defendants named in the caption violated the law, and how you were harmed. Each paragraph must be numbered

separately, beginning with number 7. Please write each single set of circumstances in a separately numbered paragraph.

7.

7) I was dismissed from Purdue University Global (PUG) on January 3rd 2021 based on school's academic misconduct violation on alleged report to school from a clinical preceptor located in Minnesota. Administrative due process was not carried out by the school in respect to properly carrying out a thorough investigation and interrogation leading to improper expulsion and potentially permanent consequences on me and my career. This also lead to the failure of giving me the opportunity to exercise my first amendment rights and rights provided in the school's policy manual leading to me being silenced by the institution.

8) Breach of contract: Prior to enrolling to the school, I was promised by the school's enrollment specialist to be provided and supported in securing a clinical site for completion of clinical work. This was not the case as the school did not provide a site but instead informed students like myself to search for site. Fees for clinical sites and courses are included in the tuition. Funds directed to clinical sites are not paid by school if the student finds the site.

9) Educational Malpractice: The School takes in loans and outofpocket payments in their promise to educate, provide quality education, a safe environment, and establish diversity and equity. They promised discount if i signed up as a student which was never fulfilled. These concerns were brought to Indiana CHE with no actions.

Attach additional sheets of paper as necessary.

Check here if additional sheets of paper are attached: ☒

Please label the attached sheets of paper to as Additional Facts and continue to number the paragraphs consecutively.

REQUEST FOR RELIEF

State what you want the Court to do for you and the amount of monetary compensation, if any, you are seeking.

- Review the school's and CHE's administrative process and actions
- Reverse dismissal and remove dismissal in student record
- Present evidence and witnesses
- Lawyer's fees (15,000), damages & employment loss wages (42,000), student loans and out-of-pocket payment to PUG (19,935), travel expenses & accommodation (3500), medical & malpractice insurance NSO (330), New school program cost & expenses (45000), filing fee 402⁰⁰

Total = 126,167

STATEMENT OF THE CLAIM

Describe in the space provided below the basic facts of your claim. The description of facts should include a specific explanation of how, where, and when each of the defendants named in the caption violated the law, and how you were harmed. Each paragraph must be numbered separately, beginning with number 7. Please write each single set of circumstances in a separately numbered paragraph.

9) Continuation

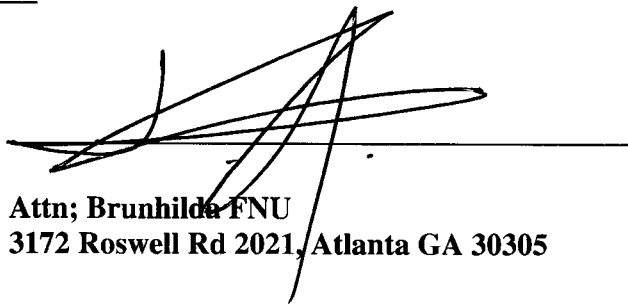
The administrative process adopted by the school is approved and accredited by the Indiana Commission for Higher Education. The commission is listed as a complaint process under the Purdue catalog. Once the student files complaints to this unit, they claim not having enough powers to control the school's policies and procedures which is untrue as listed under step 4 of the complaint process. PUG is located in Indiana along with CHE which gives the two a stronger relationship and a measure of protection under their umbrella. The CHE looks into private and public to make sure the school has resources to provide and safeguard both online and oncampus students. They failed to make sure these standards are maintain and followed leading to PUG violating a due process. I raised multiple complaints to CHE ranging from the ineffective school's due process, the nursing graduate program, abuse, discrimination, retaliation faced at the school and at the clinical site but no investigation was conducted.

10) Unlawful discrimination and retaliation: On numerous occasions, I had complained School staff, support team, clinical managers (Aaron Page) back in march 2020 and ongoing that the school did not provide enough help and guidance on online based education with out of state students nor did they have adequate resources to provide an online based education but my concerns were dismissed. Aaron Page was primarily one of the main Staff I complained to for clinical issues. When I initially received a dismissal email from Purdue University Global staff Aaron Page on dismissal based on violation of student code of conduct, it was evident based on my past complaints that they were looking for ways to get rid of me. The course instructor Dr Hanson's lack of responsibility to respond, communicate and failure to act within a timely frame leads to concerns of bias/racial discrimination based on her previous conversations and actions.

11) Negligence: Safety and security is imperative for all. I faced multiple and ongoing bullying, harassment, emotional distress at the clinical site. These were reported to the school administrative. The ongoing concerns were a nobother to the school official as the school did not address them nor provide preventive measures. These concerns were brought to Indiana CHE as well. No action taken.

Signed this **25th** day of May, 2021

Signature of Plaintiff

A handwritten signature in black ink, appearing to be "Brunhilda FNU", written over a horizontal line.

Mailing Address

Attn; Brunhilda FNU
3172 Roswell Rd 2021, Atlanta GA 30305

Telephone Number

(651) 500-6507

Note: All plaintiffs named in the caption of the complaint must date and sign the complaint and provide his/her mailing address and telephone number. Attach additional sheets of paper as necessary.